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USDOC FOR 3131/USFCS/OIO/ANESA/KREISSL  
USDOC FOR 4530/MAC/ANESA/OSA  
ICE HQ FOR STRATEGIC INVESTIGATIONS  
STATE FOR EB/ESP

E.O. 12958: N/A

TAGS: [ETTC](#) [ETRD](#) [BEXP](#) [IN](#)

SUBJECT: EXTRANCHECK: POST-SHIPMENT VERIFICATION: LAWRENCE AND MAYO  
(I) PVT. LTD., MUMBAI

REF: USDOC 08443

¶1. Unauthorized disclosure of the information provided below is prohibited by Section 12(c) of the Export Administration Act.

¶2. On October 17, 2007, Export Control Officer (ECO) Paul Cushman and BIS FSN Prem Narayan conducted a Post-shipment Verification (PSV) at Lawrence and Mayo (I) Pvt. Ltd. (L&M), Mumbai.

¶3. BIS requested a PSV at L&M, a private sector company, located at: Lawrence & Mayo House, 274 Dr. D.N. Road, Mumbai 400001, Tel: 91-22-2207-7440, Fax: 91-11-2207-0048, Email: instmum@lawrenceandmayo.co.in, website: lawrenceandmayo.co.in. Reftel requested BIS New Delhi conduct the PSV at L&M in Panvel, Maharashtra. Upon establishing contact with L&M, they advised BIS New Delhi that the Panvel facility is for warehousing only. Therefore, the PSV was conducted at L&M headquarters in Mumbai. L&M was listed as the Ultimate Consignee for two radio navigational aid apparatuses (reception only) two Carlson Explorer II mini hand-held computers with SurvCE GPS, two mini hand-held computer cradles and two mini hand-held computer clamps. The exporter was Western Latitudes (WestLat), Centennial, Colorado. Export License Number: No License Required (NLR). ECCN: 7A005.

¶4. ECO and FSN Narayan met with R.H. Mendonsa, Managing Director and G.V. D'Souza (D'Souza), General Manager, Geometrics & Engineering Instruments Division, L&M. D'Souza stated that in 2006, WestLat appointed L&M as the exclusive distributor in India for the entire NavCom product line.

¶5. Reftel listed radio navigational aid apparatus (reception only) as one of the items on check. D'Souza stated that this specific item was not ordered or imported. He went on to say that this is a broad product classification that also covers all Global Positioning System (GPS). In this case, it referred to two GPS units. L&M has informed WestLat that they have been incorrectly using the word "radio" in the product classification.

¶6. D'Souza stated that the items on check are incorporated into a sophisticated and rugged Global Positioning System (GPS) used in the conduct of physical surveys. Clients for this equipment include real estate developers, construction firms, and engineering firms involved with infrastructure projects. He stated that prior to initiating any project, their clients conduct an engineering survey of the terrain and record topographical data. The data collected are then used to prepare designs for roads, railroads, canals, buildings, and townships.

¶7. D'Souza stated that the items on check were sold to Reliance Gas Transportation Infrastructure Ltd. (RGTI) based in Navi Mumbai,

Maharashtra. RGTI's parent company, Reliance Group, is India's largest private sector enterprise, with subsidiaries in polyester, fiber intermediates, plastics, petrochemicals, petroleum refining, oil & gas exploration and production. RGTI purchased the GPS to conduct topographical surveys in preparation for a pipeline project. When completed, the pipeline will deliver natural gas to homes throughout India.

¶18. To substantiate this sale to RGTI, D'Souza provided the following documents: WestLat Commercial Invoice, L&M Tax Invoice reflecting quantity as four GPS sold to RGTI, a receipt for import duties paid to the Indian Customs Service, delivery challan, and RGTI acknowledgement of receipt of the items on check.

¶19. D'Souza then provided the BIS team with a tour of L&M's offices, a small warehouse where they maintain an inventory of WestLat/NavCom products, and a small workshop where they assemble new equipment and repair equipment supplied under warranty. In the L&M workshop, D'Souza assembled a GPS unit with the Starfire pole-mounted receiver (similar to that listed in reftel) and demonstrated its usage.

¶10. Established in 1877, L&M is a small company with two divisions: Optical and Instruments. The Optical Division is L&M's core business. It has 43 outlets in 17 Indian cities selling spectacle frames, prescription lenses, contact lenses, sunglasses, and optical accessories. In the Instruments Division, L&M represents foreign firms, marketing their products in India. L&M's Instruments Division has 16 sales offices in India. The products that L&M handles include surveying, material testing, environmental monitoring equipment, scientific instruments, vacuum pumps, vacuum systems, vacuum oil and vacuum accessories. D'Souza mentioned several times that L&M supplies vacuum systems to Bhabha Atomic Research Centre (BARC). L&M's other clients include Indian Railways, collieries, oil industry, universities and engineering colleges, quality control and research laboratories. L&M employs

approximately 130 personnel. L&M's sales for FY-07 were approximately 5 million USD.

¶11. Recommendation: Based on the interview and inspection of documents provided, the business operations of Lawrence & Mayo (I) Pvt. Ltd. appear to be legitimate. However, because a physical inspection of the listed items could not be accomplished, the PSV for this transaction remains inconclusive.

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